

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. H-15-510
	§	
GREGG CARL BAIRD	§	

**DEFENDANT’S UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS**

TO THE HONORABLE DAVID HITTNER:

Gregg Carl Baird files Defendant’s Unopposed Motion For An Extension Of Time To File Pre-Trial Motions, and for cause would show as follows:

I.

Defendant is charged with receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(B) (count one); access with intent to view child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count two); and possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B) (count three). He is detained pending trial. His pre-trial motions are due on November 20, 2015, and a jury trial is scheduled for January 11, 2016.

II.

The Government and counsel for defendant are engaged in plea negotiations but need more time to determine whether the case can be resolved without a trial. Counsel does not want to file motions and cause the Government to expend its

valuable time responding if the case can be resolved without a trial. Accordingly, counsel requests a short extension of the November 20 motions deadline, as well as the Government's deadline to respond. Counsel proposes a new motions deadline of December 4. The Government is not opposed to this extension.

At this time, the parties do not believe that it is necessary to continue the trial setting, unless the Court decides to do so as a result of extending the motions deadline. Should the parties reach an agreement, counsel will notify the Court immediately.

This motion is made in the interests of justice and not to delay the proceedings. Defendant requests that the Court grant this motion.

Respectfully submitted,

/S/ Josh Schaffer

Josh Schaffer

State Bar No. 24037439

Federal ID No. 33073

1021 Main, Suite 1440

Houston, Texas 77002

(713) 951-9555

(713) 951-9854 (facsimile)

josh@joshschafferlaw.com

Attorney for Defendant

GREGG CARL BAIRD

CERTIFICATE OF CONFERENCE

I conferred with Sherri Zack, Assistant United States Attorney, on November 20, 2015, and she does not oppose this motion.

/S/ Josh Schaffer
Josh Schaffer

CERTIFICATE OF SERVICE

I served a copy of this document on Sherri Zack, Assistant United States Attorney, by electronic filing on November 20, 2015.

/S/ Josh Schaffer
Josh Schaffer

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ORDER

Baird's Unopposed Motion For An Extension Of Time To File Pre-Trial Motions is **GRANTED**. Baird's pre-trial motions, if any, must be filed by December 4, 2015.

Signed at Houston, Texas, on November ____, 2015.

David Hittner
United States District Judge